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March 20, 2012

Gracie Porter, Chair
Metro Nashville Board of Public Education
2601 Bransford Avenue
Nashville, TN 37204

Re: Complaint against Dr. Jesse Register
Metro Code Chapter 2.222

Dear Ms. Porter:

I am enclosing for your attention a Complaint filed by Mr. Doug Collier against Dr. Jesse Register for violations of Metro Code Chapter 2.222. Mr. Collier is filing this Complaint with the Board of Education pursuant to § 2.222.060, which provides that complaints regarding violations by employees shall be made to the appointing authority.

Mr. Collier requests that the Board conduct a hearing on this Complaint, as provided by Chapter 2.222. Please advise me concerning the date and time for the hearing.

Sincerely,

Mark Brooks

cc: Doug Collier

**BEFORE THE BOARD OF EDUCATION OF METROPOLITAN
NASHVILLE AND DAVIDSON COUNTY**

Complaint against Jesse Register Pursuant to Metro Code Chapter 2.222

1. I, Doug Collier, hereby submit this complaint that Dr. Jesse Register, Director of Metro Nashville Public Schools ("MNPS"), has violated Chapter 2.222 of the Metropolitan Code by failing to timely file complete and meaningful annual disclosure statements and benefit reports with Metro Government.
2. I am a legal resident of Metro Nashville and Davidson County. My current mailing address is 521 Central Avenue, Nashville, TN 37211. I am the President of Service Employees International Union Local 205.
3. I am attaching true copies of the following documents, which I have obtained by a public records request to the Metropolitan Clerk:
 - a. Exhibit A: the Annual Disclosure Statement and Annual Benefit Reporting Statement for the year ended December 31, 2009, filed by Dr. Register with the Metro Clerk on January 15, 2010;
 - b. Exhibit B: the Annual Disclosure Statement for the year ended December 31, 2010, signed by Dr. Register on February 22, 2012; and
 - c. Exhibit C: the Annual Disclosure Statement and Annual Benefit Reporting Statement for the year ended December 31, 2011, filed by Dr. Register with the Metro Clerk on February 21, 2012.
4. Since on or about January 31, 2011 and continuing, Dr. Jesse Register, the Director of Metro Nashville Public Schools, has violated §§ 2.222.020(r), 2.222.030(B), and 2.222.030(C) by the following acts and omissions:
 - a. Dr. Register failed to file Annual Disclosure Statements for the years 2010 and 2011 until February 21, 2012, although such reports were required to be filed by no later than January 30, 2011 and January 30, 2012, respectively.
 - b. Dr. Register has failed to file any Annual Benefit Reporting Statement for the year 2010.
 - c. Dr. Register failed to file an Annual Benefit Reporting Statement for the year 2011 until February 21, 2012, and refused to disclose any of the information required to be included with such form by Metro Code § 2.222.030(C).
 - d. In the Annual Benefit Reporting Statement for the year ended December 31, 2009, Dr. Register merely drew a line through the section where "Anything of Value" received by the employee during the year should be entered. It is unclear from this entry whether Dr.

Register contends that he has no such information to report, or that he is not required to report such information.

5. Dr. Register's failure to timely file full and complete Annual Disclosure Statements and Annual Benefit Reporting Statements clearly violates Metro Code Chapter 2.222 for the following reasons:

a. Section 2.222.030 requires designated employees of Metro Government to file both disclosure statements each year. Section 2.222.030(A)(5) clearly provides that these disclosure requirements apply to "all directors, executive directors, assistant directors, and associate directors of metropolitan government agencies, boards, and commissions, but not including Nashville Electric Service, the Metropolitan Nashville Airport Authority, the Metropolitan Development and Housing Agency and the Metropolitan Transit Authority."

b. The Metro Board of Public Education was created by Article 9 of the Metro Charter and constitutes a "board" of the Metro Government of Nashville and Davidson County. Metro Nashville Public Schools is an agency of Metro Government. Dr. Register is an "employee" of Metro Government, as that term is defined under Metro Code § 2.222.010(5), and a "director" within the meaning of § 2.222.030(A)(5).

c. There is no basis for any claim that MNPS is not covered by Chapter 2.222. Indeed, by specifying that certain Metro board and agencies are not covered (for example, NES and the Metro Nashville Airport Authority), it is clear that Metro Council intended that all other boards and agencies of Metro Government are covered by the statute, including Metro Nashville Public Schools.

d. It is also my understanding that Dr. Register's contract with the Board of Education specifically provides that he shall comply the disclosure requirements of Chapter 2.222.

e. Section 2.222.020(r) provides as follows:

"If disclosure statements are required to be filed by the employee in accordance with this chapter, [the employee] shall not fail or refuse to file in a timely manner all disclosure statements and reports, which statements and reports shall include all material information reasonably required to be included and shall not omit any material information reasonably necessary to make such reports complete and meaningful."

f. Sections 2.222.030(B) and (C) provide that all required disclosure statements must be filed on or before January 30 of each year for the preceding year. Section 2.222.030(C) provides that covered employees must disclose specific information required by the annual benefit disclosure statement, including "anything of value" received during the previous year, as that term is defined by § 2.222.010.

g. By failing to timely file the required disclosure statements for 2010 and 2011, Dr. Register violated the foregoing provisions of Chapter 2.222.

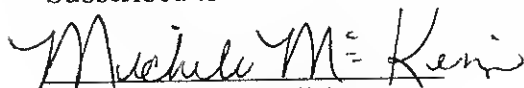
- h. In addition, by failing to disclose any of the information required by the Annual Benefit Reporting Statement for 2010 or 2011 (and by failing even to file the benefits disclosure report for 2010), Dr. Register has violated Chapter 2.222. Dr. Register may also have failed to fully disclose this information on his benefits disclosure report for 2009.
 - i. Dr. Register's violations of Chapter 2.222 also violate his employment contract with the Board of Education.
6. I therefore respectfully request that the Board of Education conduct a hearing on this complaint, and thereafter require Dr. Register to immediately and properly file all required disclosure statements with the Metropolitan Clerk. I also request that the Board take all other appropriate actions in this matter, as specified by Metro Code §§ 2.222.040(C)(3) and 2.222.050.

Respectfully submitted,


Doug Collier

State: Tennessee
County: Davidson

Subscribed to and sworn to before me on this 19th day of March 2012.


(Notary Public)

My commission expires March 3, 2015.



ANNUAL DISCLOSURE STATEMENT

NAME: Jesse B. Register POSITION/OFFICE Director of Schools

This Annual Disclosure Statement is submitted in compliance with Section 2.222.030 of the Metropolitan Code for the year ended December 31, 2009.

(Use additional sheets of paper as necessary.)

1. List all sources of your income for the preceding calendar year. Gifts from family members and relatives by blood or marriage need not be disclosed.

Sources: N.C. Retirement System
Annenberg Institute For School Reform, Brown University
(terminated Jan. 16, 2009)

2. To the best of your knowledge, list all sources of income for your spouse for the preceding year. Gifts from family members and relatives by blood or marriage need not be disclosed.

Sources: Memorial Hospital, Chattanooga TN

3. Do you or your spouse presently have a financial interest of at least 5% (five percent) of any business with operations, offices, or interests in the Metropolitan Nashville area?

 Yes ✓ No

If Yes:

| Yourself or Spouse | Business name and address | Percent of the interest, if known |
|--------------------|---------------------------|-----------------------------------|
| | | |
| | | |
| | | |

4. Do you or your spouse have a direct or indirect financial interest in any real property located in Davidson County, including your primary residence? Indirect interests indicate interests of greater than 5% in Real Estate Investment Trusts, other trusts in which you hold a beneficial interest in excess of 5% and other legal entities whose primary business is real estate related.

 Yes ✓ No

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METROPOLITAN
CLERK

If Yes:

Name and address of the real property: _____

5. Do you or your spouse hold any paid or unpaid position with any for-profit entity, non-profit entity, labor group, or educational or other institution which you have not already listed on this form:

_____ Yes ☒ No

If Yes:

| Person | Position | Entity |
|--------|----------|--------|
|--------|----------|--------|

6. Do you or your spouse have a financial interest in, or are you or a family member a party to, any litigation involving the Metropolitan Government?

_____ Yes ☒ No

If Yes, describe each: _____

7. Do you or your spouse have any* debts, guarantees, or endorsements of debts aggregating over \$5,000 owed to any one creditor?

*Excluding liabilities owed to a family member or relative by blood or marriage, and excluding loans from established financial institutions made in the ordinary course of business on usual and customary terms.

_____ Yes ☒ No

If Yes, describe each: _____

8. Do you or your spouse have any debts in excess of \$5,000 which are secured by a guarantee or collateral of any individual other than a family member or a relative by blood or marriage?

_____ Yes ☒ No

If Yes, describe each: _____

The information provided herein is, to the best of my knowledge and belief, true and complete.

Jim Bugata
Signature

1/14/10
Date

Melissa Bugant
Signature of Witness

1/14/10
Date

ANNUAL BENEFIT REPORTING STATEMENT

EMPLOYEE NAME: Jesse Register

For the year ended December 31, 2009.

(Use additional sheets of paper as necessary.)

Instructions:

List Anything of Value you have received, as defined in Chapter 2.222 of the Metropolitan Code of Laws, during the previous calendar year.

a. Benefit type may be described by reference to the following abbreviations:

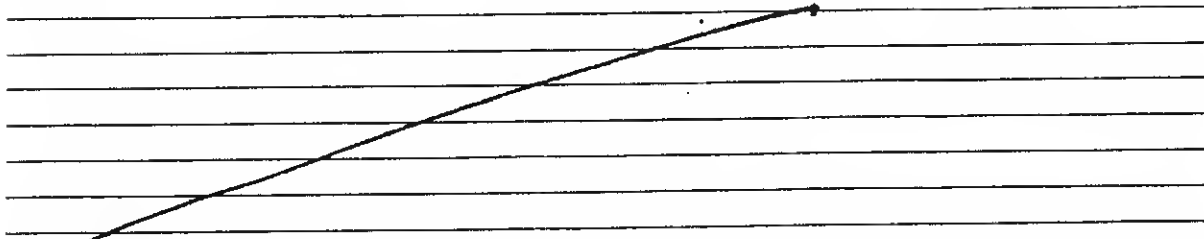
M = Meals, food, and beverage items

A = Admissions, tickets to events, or other access (including parking)

T = Travel expense

O = Other (describe)

b. For purposes of this report, the Member is not required to list those items set forth in Section 2.222.030 C 1 and 2.

| Source | Date | Benefit Type and Description | Value: |
|--|------|------------------------------|--------|
|  | | | |

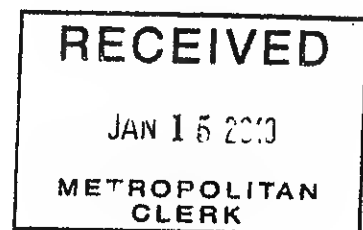
The information provided herein is, to the best of my knowledge and belief, true and complete.

Jesse Register
Signature of Employee

1/14/10
Date

Melissa Bryant
Signature of Witness

1/14/10
Date



ANNUAL DISCLOSURE STATEMENT

NAME: Jesse Register POSITION/OFFICE Director of Schools

This Annual Disclosure Statement is submitted in compliance with Section 2.222.030 of the Metropolitan Code for the year ended December 31, 2010.

(Use additional sheets of paper as necessary.)

1. List all sources of your income for the preceding calendar year. Gifts from family members and relatives by blood or marriage need not be disclosed.

Sources: N.C. Retirement System
MNPS Board of Education
T.S.B.A. (1 day)
Vanderbilt University (1/2 day)

2. To the best of your knowledge, list all sources of income for your spouse for the preceding year. Gifts from family members and relatives by blood or marriage need not be disclosed.

Sources: N/A.

3. Do you or your spouse presently have a financial interest of at least 5% (five percent) of any business with operations, offices, or interests in the Metropolitan Nashville area?

 Yes ✓ No

If Yes:

| Yourself or Spouse | Business name and address | Percent of the interest, if known |
|--------------------|---------------------------|-----------------------------------|
| | | |
| | | |
| | | |

4. Do you or your spouse have a direct or indirect financial interest in any real property located in Davidson County, including your primary residence? Indirect interests indicate interests of greater than 5% in Real Estate Investment Trusts, other trusts in which you hold a beneficial interest in excess of 5% and other legal entities whose primary business is real estate related.

 Yes ✓ No

If Yes:

Name and address of the real property: _____

5. Do you or your spouse hold any paid or unpaid position with any for-profit entity, non-profit entity, labor group, or educational or other institution which you have not already listed on this form:

_____ Yes ☒ No

If Yes:

| Person | Position | Entity |
|--------|----------|--------|
|--------|----------|--------|

| | | |
|-------|-------|-------|
| _____ | _____ | _____ |
| _____ | _____ | _____ |

6. Do you or your spouse have a financial interest in, or are you or a family member a party to, any litigation involving the Metropolitan Government?

_____ Yes ☒ No

If Yes, describe each: _____

7. Do you or your spouse have any* debts, guarantees, or endorsements of debts aggregating over \$5,000 owed to any one creditor?

*Excluding liabilities owed to a family member or relative by blood or marriage, and excluding loans from established financial institutions made in the ordinary course of business on usual and customary terms.

_____ Yes ☒ No

If Yes, describe each: _____

8. Do you or your spouse have any debts in excess of \$5,000 which are secured by a guarantee or collateral of any individual other than a family member or a relative by blood or marriage?

_____ Yes ☒ No

If Yes, describe each: _____

The information provided herein is, to the best of my knowledge and belief, true and complete.

Jack Blazette
Signature

2/22/12
Date

Melissa Bryant
Signature of Witness

2/22/12
Date

ANNUAL DISCLOSURE STATEMENT

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METROPOLITAN
CLERKNAME: Jesse B. Register POSITION/OFFICE Director of Schools

This Annual Disclosure Statement is submitted in compliance with Section 2.222.030 of the Metropolitan Code for the year ended December 31, 2011.

(Use additional sheets of paper as necessary.)

1. List all sources of your income for the preceding calendar year. Gifts from family members and relatives by blood or marriage need not be disclosed.

Sources: N.C. Retirement System
Vanderbilt Univ. (\$1500)
TSBA (\$1000)

2. To the best of your knowledge, list all sources of income for your spouse for the preceding year. Gifts from family members and relatives by blood or marriage need not be disclosed.

Sources: single

3. Do you or your spouse presently have a financial interest of at least 5% (five percent) of any business with operations, offices, or interests in the Metropolitan Nashville area?

 Yes ✓ No

If Yes:

| Yourselves or Spouse | Business name and address | Percent of the interest, if known |
|----------------------|---------------------------|-----------------------------------|
| | | |
| | | |
| | | |

4. Do you or your spouse have a direct or indirect financial interest in any real property located in Davidson County, including your primary residence? Indirect interests indicate interests of greater than 5% in Real Estate Investment Trusts, other trusts in which you hold a beneficial interest in excess of 5% and other legal entities whose primary business is real estate related.

 Yes ✓ No

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FEB 21 2012

METROPOLITAN
CLERK

If Yes:

Name and address of the real property: _____

5. Do you or your spouse hold any paid or unpaid position with any for-profit entity, non-profit entity, labor group, or educational or other institution which you have not already listed on this form:

_____ Yes ☒ No

If Yes:

| Person | Position | Entity |
|--------|----------|--------|
|--------|----------|--------|

6. Do you or your spouse have a financial interest in, or are you or a family member a party to, any litigation involving the Metropolitan Government?

_____ Yes ☒ No

If Yes, describe each: _____

7. Do you or your spouse have any* debts, guarantees, or endorsements of debts aggregating over \$5,000 owed to any one creditor?

*Excluding liabilities owed to a family member or relative by blood or marriage, and excluding loans from established financial institutions made in the ordinary course of business on usual and customary terms.

_____ Yes ☒ No

If Yes, describe each: _____

8. Do you or your spouse have any debts in excess of \$5,000 which are secured by a guarantee or collateral of any individual other than a family member or a relative by blood or marriage?

_____ Yes ☒ No

If Yes, describe each: _____

The information provided herein is, to the best of my knowledge and belief, true and complete.

[Signature]
Signature

2/21/12
Date

Melissa Bugant
Signature of Witness

2/21/12
Date

ANNUAL BENEFIT REPORTING STATEMENT

EMPLOYEE NAME: Jesse Register

For the year ended December 31, 2011.

(Use additional sheets of paper as necessary.)

Instructions:

List Anything of Value you have received, as defined in Chapter 2.222 of the Metropolitan Code of Laws, during the previous calendar year.

a. Benefit type may be described by reference to the following abbreviations:

M = Meals, food, and beverage items

A = Admissions, tickets to events, or other access (including parking)

T = Travel expense

O = Other (describe)

b. For purposes of this report, the Member is not required to list those items set forth in Section 2.222.030 C 1 and 2.

| Source | Date | Benefit Type and Description | Value: |
|--------------------------------------|------|------------------------------|--------|
| N.A. per Mary Johnson | | | |

The information provided herein is, to the best of my knowledge and belief, true and complete.

Jesse Register
Signature of Employee

2/21/12
Date

Melvin Bryant
Signature of Witness

2/21/12
Date

